confession, true or false—a theory which could scarcely merit serious consideration. The decision of the majority of the court, in so far as it is based upon this portion of the evidence, would seem therefore to stand on a somewhat infirm foundation.

DEEDS—SEPARATE WRITINGS CONSTRUED TOGETHER.—Plaintiff sued for the recovery of land and offered in evidence a deed as part of his claim of title. In connection with this deed, and as part of it, plaintiff offered also a separate piece of paper, containing matter of description, continuous with and supplemental to the description of property embodied in the deed proper, and which though not signed, nor referred to in the deed proper, was delivered to the grantee along with the deed and as part of it. *Held,* it was properly received in evidence as part of the deed. *Kyle* v. *Jordan* (Ala. 1914), 65 So. 522.

In view of the law in regard to evidence aliunde the instrument, either will or deed, this decision seems to take a dangerous trend. It is well settled that extrinsic documents *referred to* in deeds may be resorted to for identification of the property or estate intended to be conveyed. *Heffelman* v. *Otsego Water-Power Co.,* 78 Mich. 121, 44 N. W. 1151; *Allen* v. *De Groodt,* 105 Mo. 442, 16 S. W. 494, 1049; *Hoffman* v. *City of Port Huron,* 102 Mich. 417, 60 N. W. 831; *Ford* v. *Belmont,* 30 N. Y. Super. Ct. (7 Rob.) 97; *Watson* v. *Boylston,* 5 Mass. 411. In these cases the emphasis is placed on the reference in one instrument to the other. The court itself makes mention of the analogy in the law of wills that an extrinsic document cannot be treated as a part of a will unless it is distinctly referred to, accurately described, and in actual existence. *Bryan's Appeal,* 77 Conn. 240, 58 Atl. 748, 68 L. R. A. 353, and note, 107 Am. St. Rep. 34, 1 Ann. Cas. 393; *Bryan* v. *Bigelow,* 77 Conn. 604, 60 Atl. 266, 107 Am. St. Rep. 64, and note; *Estate of Young,* 123 Cal. 337, 342, 55 Pac. 1011; *Fickle* v. *Snepp,* 97 Ind. 289, 49 Am. Rep. 449; *Tonnele* v. *Hall,* 4 N. Y. 140; *Baker's Appeal,* 107 Pa. St. 381, 52 Am. Rep. 478. These analogies are refuted by the court, however, and the evidence admitted on the ground that it was continuous, coherent, and consistent with that part of the deed which it purports to supplement. It would seem that to allow the introduction of such evidence without any reference to it in the body of the deed, is to destroy the safeguards of the parole evidence rule.

DIVORCE—WIFE'S REFUSAL TO FOLLOW HUSBAND NOT DESERTION.—Plaintiff and defendant, husband and wife, occupied one-half of a double house owned by the wife's mother who lived in the other half. Difficulties soon arose between defendant and his mother-in-law, and when the situation became unbearable, he moved away to another part of the city. The plaintiff refused to follow him. There was evidence to show that the wife was in poor health, and that her mother aided her in her household duties, and that she had a more comfortable home where she was, than her husband could provide. *Held,* that the wife's refusal to follow her husband did not constitute desertion. *Copping* v. *Termini,* (La. 1914) 65 So. 132.